

August 2013
Public Hearing Comments
South Atlantic CMP Framework Action 2013

Summary of Comments

5 individuals provided public comment at the hearings.
2 individuals provided written comments.

Action 1- transfer at sea of Spanish mackerel

- One commenter supported no action.
- One commenter felt that there was no need for a call-in requirement because the Mid-Atlantic did not have this requirement, and this would be unnecessary.
- Three commenters (including the AP Chair) supported Alternative 2 as the Preferred. The AP Chair felt like it was necessary and would not be abused.

Action 2- king mackerel trip limit in the East Coast Florida Subzone

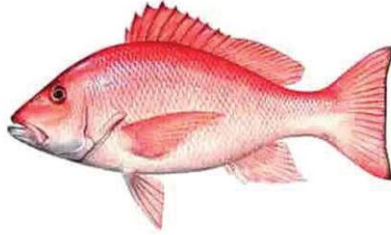
- Four commenters supported Preferred Alternative 4.
- One commenter supported an increase in the trip limit.

Hi my name is Vincent Bonura from Goin' Off Enterprises Inc. **Action 1:** I beleive it should be ok to transfer fish on a gill net boat to another permitted vessel at sea in order to reduce dead discards. **Action 2:** Please up the king mackeral trip limit in order to maximize profits per trip vs. the high expenses and fuel costs of todays fishing businesses.

Tight Lines,
Vincent Bonura

DIRECTED SUSTAINABLE FISHERIES, INC.

A FISHERIES CONSULTING COMPANY



Mr. Bob Mahood, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Date: Sunday August 18, 2013

Re: Coastal Migratory Pelagics Fishery Management Plan Framework Amendment Proposed
Actions and DSF Preferred Alternatives SAtlCMPFWComments@safmc.net

Mr. Mahood,

Directed Sustainable Fisheries, Inc., (DSF) is submitting written comment concerning the South Atlantic Fishery Management Council's (SAFMC) proposed actions on Coastal Migratory Pelagics (CMP) fishery management plan (FMP) Framework Amendment. DSF preferred alternatives are presented from DSF in "red" for each of the two actions.

Proposed Actions

Action 1. Modify restrictions on transfer-at-sea and gillnet allowances for Atlantic migratory group Spanish mackerel.

DSF Preferred Alternative 2. Alternative 2 applies only to commercial harvest of Atlantic migratory group Spanish mackerel with gillnet. This alternative recognizes that the current biomass levels of Spanish mackerel may result in catches of Spanish mackerel in excess of the commercial trip limit by vessels using gillnets. Specifically, even with very short sets, these gillnets may exceed the daily trip limit. As such, the regulations would be modified to allow for the transfer of Spanish mackerel at sea. Any amount of Spanish mackerel less than the commercial trip limit could be transferred between two vessels given the following conditions:

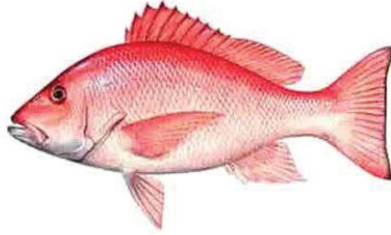
- a) Transfer is allowed if directed harvesting gear used to harvest the Spanish mackerel being transferred is allowable net gear. Spanish mackerel harvested with other than directed allowable net harvesting gear shall not be transferred.
- b) Transfer shall only take place in the EEZ between vessels with valid Spanish mackerel commercial permits.
- c) The receiving vessel may possess no more than three gillnets on board after the transfer is complete.

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- d) All fish exceeding the applicable daily vessel limit shall remain entangled in the meshes of the net until transfer. The quantity of fish transferred to any single vessel shall not exceed the applicable daily trip limit.
- e) Call-in is required for both vessels engaged in the transfer.

The following describes how transfer at sea may occur: After catching the Spanish mackerel in the gillnet, the donor vessel would cut the net into two sections. The captain would transfer the portion of the net to the receiving vessel. The receiving vessel would accept the portion of the net and retrieve that portion on the vessel. Call-in by both vessels should be made prior to the net being cut.

Action 2. Modify the king mackerel commercial trip limit in the East Coast Florida Subzone.

DSF Preferred Alternative 4. In the Florida East Coast Subzone, king mackerel in or from the EEZ may be possessed on board at any time or landed in a day from a vessel with a commercial permit for king mackerel as follows:

- (A) From November 1 through the end of February--not to exceed 50 fish.
- (B) Beginning on March 1 and continuing through March 31--
- (1) If 70 percent or more of the [Gulf group] Florida east coast subzone quota has been taken--not to exceed 50 fish.
- (2) If less than 70 percent of the [Gulf group] Florida east coast subzone quota has been taken --not to exceed 75 fish.

Rusty

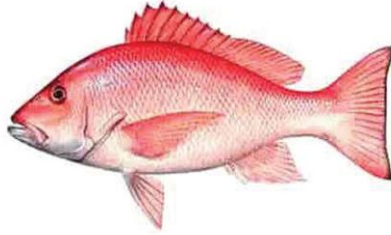
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Recreational, For-Hire & Commercial Fishing Life Experience, 1959-2013
Retired 100-ton United States Coast Guard (USCG) Licensed Sea Captain
Fifth Generation Waterman from Central Florida East Coast
Seafood Coalition (SFC) member
American Elasmobranch Society (AES) member 2004-2013
Atlantic Coastal Cooperative Statistics Program (ACCSP) Advisory Committee member from Florida
Atlantic States Marine Fisheries Commission (ASMFC) Coastal Shark (CS) Florida (FL) Advisory Panel (AP) commercial & for-hire recreational member [former Chair of CS AP]
National Marine Fisheries Service (NMFS) Highly Migratory Species (HMS) AP commercial member 2013-2015
NMFS HMS SouthEast Data, Assessment and Review (SEDAR) AP Pool member 2013-2015
South Atlantic Fishery Management Council (SAFMC) SEDAR AP Pool member
SAFMC Marine Protected Area (MPA) Expert Working Group participant
Former SAFMC MPA AP FL commercial member
Former NMFS Atlantic Large Whale Take Reduction Team FL participant (ALWTRT)
Former NMFS Bottlenose Dolphin Take Reduction Team FL participant (BDTRT)
Participant, observer and/or contributor to US coastal shark stock assessments during 1992, 1996, 1998, 2001, 2002, 2005, 2006, 2007, 2011, 2012 and 2013
Participant, observer and/or contributor SouthEast Data, Assessment and Review (SEDAR) 11 (Large Coastal Sharks), 13 (Small Coastal Sharks), 16 (King Mackerel), 19 (Red Grouper/Black Grouper), 21 (Large Coastal Sharks/Small Coastal Shark), 24 (Red Snapper), 25 (Black Sea Bass/Golden Tilefish), 28 (Spanish Mackerel/Cobia), 29 (Gulf Blacktip Shark), 32 (Gray Triggerfish/Blueline Tilefish), 34 (Atlantic Sharpnose Shark/Bonnethead Shark), and SEDAR 36 (Snowy Grouper)

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